



**NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113**

Court of Common Pleas

**New Case Electronically Filed: COMPLAINT
December 21, 2020 11:24**

By: VINCENT D. SCEBBI 0095702

Confirmation Nbr. 2140401

NANCY JUCHNOWSKI

CV 20 941756

vs.

KOHLS, INC. ET AL.,

Judge: KATHLEEN ANN SUTULA

Pages Filed: 4



IN THE COURT OF COMMON PLEAS
GENERAL DIVISION
CUYAHOGA COUNTY, OHIO

NANCY JUCHNOWSKI
3850 Grant Street
Richfield, OH 44286

Plaintiff,

vs.

KOHLS, INC.
c/o Norman Kohls
110 W. Sycamore Street
Columbus Grove, OH 45830

And

JOHN DOE 1-3
Addresses Unknown

Defendants.

CASE NO.:

JUDGE

COMPLAINT

(Jury Demand Requested)

JURISDICTION OF THE PARTIES

1. The facts giving rise to this lawsuit occurring on January 21, 2019 in Kohls Inc. at 6860 Ridge Road, in the City of Parma, Cuyahoga County, Ohio.
2. At all times relevant, Plaintiff was a resident of Summit County, Ohio.
3. At all times relevant, Defendant Kohls, Inc. (hereinafter "Defendant Kohls") is/ was a duly authorized corporation licensed to do business in the State of Ohio and engaged in business of operating a retail store located in at the aforementioned location.

4. At all times herein mentioned, Defendants John Doe 1, 2, and 3 (names unknown) are/were individuals(s) who or which acted pursuant to the allegations of this Complaint so as to give rise to liability to Plaintiffs herein. Defendants John Doe 1-3 are sued herein pursuant to Civ.R. 15(D) in that Plaintiff(s) can neither know nor ascertain the true name(s). When the true name(s) of Defendants John Doe 1-3 become known to and ascertained by Plaintiff(s), this Complaint will be amended and/or supplemented to allege the same.

FIRST CLAIM OF RELIEF

5. Plaintiff re-alleges Paragraphs 1 through 4 as if fully rewritten herein.

6. On January 21, 2019, Plaintiff was walking inside Kohls in Parma, Ohio and was injured when she slipped and fell on liquid on the floor.

7. This incident was caused by the negligence of Defendant Kohls through its employees, aka Defendants John Doe 1-3.

8. Defendants John Doe 1-3 were acting in the course and scope of their employment with Defendant Kohl's, thus Defendant Kohl's is liable for its employees' negligence as the *respondeat superior*.

9. Said negligence includes, but is not limited to, the creation and/or maintenance of dangerous condition.

10. Further, Defendant Kohls knew or should have known of this dangerous condition and failed to warn Plaintiff of the same.

11. As a direct and proximate result Defendant Kohls' negligence, Plaintiff sustained bodily injuries which include, but not limited to, her left elbow, as well as other parts of her body, including her entire physical, nervous and emotional systems. The use, movement and strength of the injured portions of Plaintiff's body has been permanently impaired.

12. As a further direct and proximate result of the Defendant Kohls' negligence, the Plaintiff incurred medical and hospital expenses for the treatment of her injuries. She has reason to believe that she will continue to incur such expenses in the future.

13. As a further direct and proximate result of the Defendant Kohls' negligence, Plaintiff has incurred a loss of wages and her ability to earn income has been permanently impaired.

WHEREFORE Plaintiff demands judgment in the amount exceeding twenty-five thousand dollars (\$25,000.00+) to compensate her for her injuries and damages, plus interests, costs, and any such further relief to which Plaintiff may be entitled.

Respectfully submitted,

/s/ Vincent D. Scebbi, Esq.
VINCENT D. SCEBBI, ESQ. (0095702)
Nager, Romaine, & Schneiberg Co., LPA
27730 Euclid Avenue
Cleveland, OH 44132
Phone: 216-289-4740
Fax: 216-289-4743
Email: vscebbi@nrsinjurylaw.com
Attorney for Plaintiff

JURY DEMAND

Plaintiff demands a trial by the maximum number of jurors allowed by law.

/s/ Vincent D. Scebbi, Esq.
VINCENT D. SCEBBI, ESQ. (0095702)

PRAECIPE

Now comes Plaintiff, by and through undersigned counsel, and hereby respectfully requests the Clerk of Courts serve Defendants, by **certified mail**, with a copy of this **Complaint** at the address listed in the caption of this pleading.

Respectfully submitted,

/s/ Vincent D. Scebby, Esq.

VINCENT D. SCEBBI, ESQ. (0095702)

Nager, Romaine, & Schneiberg Co., LPA

27730 Euclid Avenue

Cleveland, OH 44132

Phone: 216-289-4740

Fax: 216-289-4743

Email: vscebby@nrsinjurylaw.com

Attorney for Plaintiff

CASE NO.
CV20941756

D1 CM

SUMMONS NO.
43266913

NANCY JUCHNOWSKI
VS
KOHLS, INC. ET AL.,

PLAINTIFF
DEFENDANT

Rule 4 (B) Ohio

Rules of Civil
Procedure

SUMMONS

KOHLS, INC.
C/O NORMAN KOHLS
110 W. Sycamore Street
Columbus Grove OH 45830

You have been named defendant in a summons
complaint (copy attached hereto) filed in Cuyahoga
County Court of Common Pleas, Cuyahoga County
Justice Center, Cleveland, Ohio 44113, by the
plaintiff named herein.

You are hereby summoned and required to answer
the complaint within 28 days after service of this
summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.

If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

Said answer is required to be served on:



Plaintiff's Attorney

VINCENT D. SCEBBI
27730 EUCLID AVE.

EUCLID, OH 44132-0000

Case has been assigned to Judge:

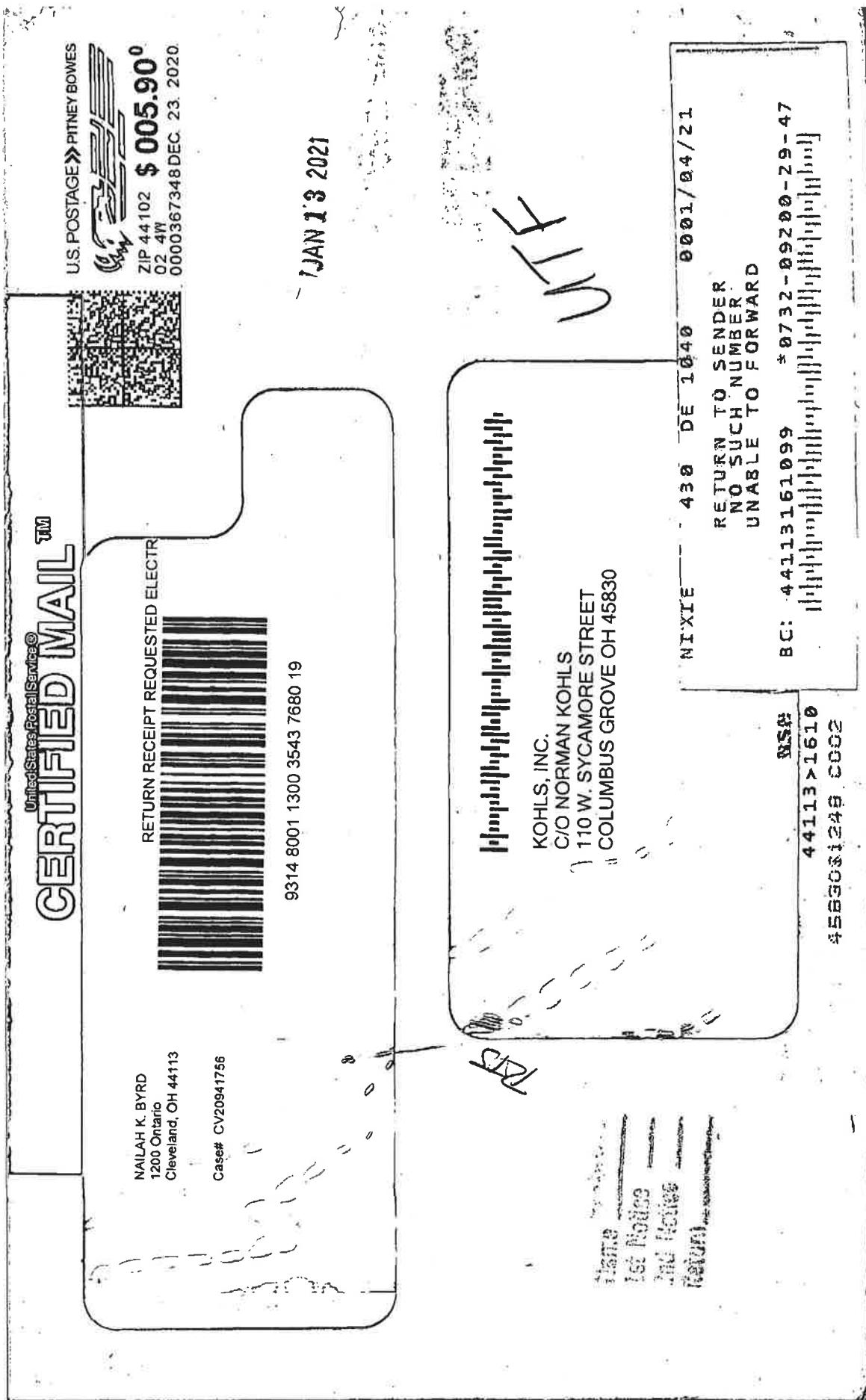
KATHLEEN ANN SUTULA
Do not contact judge. Judge's name is given for
attorney's reference only.

NAILAH K. BYRD
Clerk of the Court of Common Pleas

[Signature]
By _____
Deputy

DATE SENT
Dec 21, 2020
COMPLAINT FILED 12/21/2020







**NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113**

Court of Common Pleas

**REQUEST FOR SERVICE
January 13, 2021 11:05**

By: VINCENT D. SCEBBI 0095702

Confirmation Nbr. 2155319

NANCY JUCHNOWSKI

CV 20 941756

vs.

KOHLS, INC. ET AL.,

Judge: KATHLEEN ANN SUTULA

Pages Filed: 6



Common Pleas Court of Cuyahoga County, Ohio
Nailah K. Byrd, Clerk of Courts

INSTRUCTIONS FOR SERVICE

Nancy Juchnowski _____

Plaintiff(s)

Case Number CV 20 941756

Vs.
Kohls, Inc. et al.,
Defendants(s)

Judge: Kathleen Ann Sulula

Date: 01/13/2021

Method of Service Requested:

Certified Mail Service Ordinary Mail Service Federal Express Service

Personal Service by the Sheriff of _____ County _____

Residence Service by the Sheriff of _____ County _____

Personal Service By Process Server _____

Residence Service by Process Server _____

Name(s) and Address(es) of Parties to Serve:

Kohls, Inc. Corporate Creations Network Inc. 119 East Court Street, Cincinnati, OH 45202

Additional Instructions:

Filing Party Name: Vincent D. Scebbi Supreme Court ID if applicable: 0095702

Phone Number: 216-289-4740

For Use by Sheriff or Process Server Only

Number of Service Attempts: _____

Address for Service if Different from address included above: _____

Electronically Filed 01/13/2021 11:05 / SERVICE / CV 20 941756 / Confirmation Nbr. 2155319 / CLCXH



**NAILAH K. BYRD
CUYAHOGA COUNTY CLERK OF COURTS
1200 Ontario Street
Cleveland, Ohio 44113**

Court of Common Pleas

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GENERAL DIVISION
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c/o Norman Kohls
110 W. Sycamore Street
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Addresses Unknown

Defendants.

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13. As a further direct and proximate result of the Defendant Kohls' negligence, Plaintiff has incurred a loss of wages and her ability to earn income has been permanently impaired.

WHEREFORE Plaintiff demands judgment in the amount exceeding twenty-five thousand dollars (\$25,000.00+) to compensate her for her injuries and damages, plus interests, costs, and any such further relief to which Plaintiff may be entitled.

Respectfully submitted,

/s/ Vincent D. Scebby, Esq.
VINCENT D. SCEBBI, ESQ. (0095702)
Nager, Romaine, & Schneiberg Co., LPA
27730 Euclid Avenue
Cleveland, OH 44132
Phone: 216-289-4740
Fax: 216-289-4743
Email: vscebby@nrsinjurylaw.com
Attorney for Plaintiff

JURY DEMAND

Plaintiff demands a trial by the maximum number of jurors allowed by law.

/s/ Vincent D. Scebby, Esq.
VINCENT D. SCEBBI, ESQ. (0095702)

PRAECIPE

Now comes Plaintiff, by and through undersigned counsel, and hereby respectfully requests the Clerk of Courts serve Defendants, by **certified mail**, with a copy of this **Complaint** at the address listed in the caption of this pleading.

Respectfully submitted,

/s/ Vincent D. Scebby, Esq.

VINCENT D. SCEBBI, ESQ. (0095702)

Nager, Romaine, & Schneiberg Co., LPA

27730 Euclid Avenue

Cleveland, OH 44132

Phone: 216-289-4740

Fax: 216-289-4743

Email: vscebby@nrsinjurylaw.com

Attorney for Plaintiff

CASE NO.
CV20941756

D1 CM

SUMMONS NO.
43422060

NANCY JUCHNOWSKI
VS
KOHLS, INC. ET AL.,

PLAINTIFF
DEFENDANT

Rule 4 (B) Ohio

Rules of Civil
Procedure

SUMMONS

KOHL'S, INC.
CORPORATE CREATIONS NETWORK INC.
119 EAST COURT STREET
CINCINNATI OH 45202-0000

You have been named defendant in a summons
complaint (copy attached hereto) filed in Cuyahoga
County Court of Common Pleas, Cuyahoga County
Justice Center, Cleveland, Ohio 44113, by the
plaintiff named herein.

Said answer is required to be served on:



Plaintiff's Attorney

VINCENT D. SCEBBI
27730 EUCLID AVE.
EUCLID, OH 44132-0000

You are hereby summoned and required to answer
the complaint within 28 days after service of this
summons upon you, exclusive of the day of service.

Said answer is required to be served on Plaintiff's
Attorney (Address denoted by arrow at left.)

Your answer must also be filed with the court
within 3 days after service of said answer on
plaintiff's attorney.

If you fail to do so, judgment by default will be
rendered against you for the relief demanded in the
complaint.

Case has been assigned to Judge:

KATHLEEN ANN SUTULA
Do not contact judge. Judge's name is given for
attorney's reference only.

NAILAH K. BYRD
Clerk of the Court of Common Pleas

Deputy H.A.

Deputy



DATE SENT
Jan 13, 2021

By _____

COMPLAINT FILED 12/21/2020



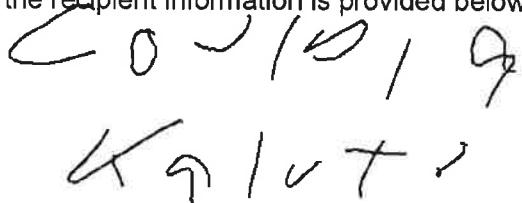


Date Produced: 01/25/2021

CERTIFIED MAIL SOLUTIONS INC.:

The following is the delivery information for Certified Mail™/RRE item number 9314 8001 1300 3543 9642 37. Our records indicate that this item was delivered on 01/19/2021 at 11:20 a.m. in CINCINNATI, OH 45202. The scanned image of the recipient information is provided below.

Signature of Recipient:



A handwritten signature consisting of two lines of cursive script. The top line starts with 'CO' and ends with '9'. The bottom line starts with 'K' and ends with 't'.

Address of Recipient:



A handwritten address in cursive script. It includes a return address '119' above 'Court' and a street name 'Court' followed by a number.

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local post office or Postal Service representative.

Sincerely,
United States Postal Service

The customer reference number shown below is not validated or endorsed by the United States Postal Service. It is solely for customer use.